

## AC 20-160A – Public Review Comment Matrix

<b>Originating Office:</b> AIR-130	<b>Document Description:</b> Onboard Recording of Controller Pilot Data Link Communication In Crash Survivable Memory	<b>Project Lead/Reviewer</b>	<b>Reviewing Office:</b>	<b>Date of Review:</b>
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	<b>Commenter</b>	<b>Section # and Page #</b>	<b>Comment</b>	<b>Suggested Change and Rationale</b>	<b>Disposition</b>
1.	Garmin	General	AC 20-160A references 14 CFR Part 23, § 23.1301 and § 23.1309. The published NPRM for Part 23 (81 FR 13452) eliminates 23.1301 and 23.1309 and replaces them with 23.1315. Publication of final rules is expected this year.	Depending on the publication date for this AC, it may be appropriate to update the AC with references to § 23.1315 as applicable.	Disagree. Reference to 23.1315 in lieu of 23.1301 and 23.1309 will occur in the next revision of this AC.
2.	Garmin	General	The terms “must” and “should” are both used in this AC but they are not defined. Definitions should be added to this AC to provide clarity as to their specific meaning.	With respect to the definitions of “must” and “should”, we recommend use of the text in the table included as an attachment at the end of the comment log table. We further recommend that the FAA standardize inclusion of these definitions within all ACs via an update to Order 1320.46D.	Partially agree. Added definition of the two terms in Paragraph 6.2; however, replaced the proposed sentence in the Functional Impact cell associated with “Should”, “None, because it is optional”, with the following sentence: “Since this AC represents an accepted means of compliance, alternative methods to obtain a compliance finding will need to be discussed with the ACO in order to achieve a common performance level with the AC.”
3.	Boeing	Page 3 Para 7.2	The DLR system must record the CPDLC messages for each data link type (i.e. Interop Designator) contained in AC 20-140C, or later approved revision, that is installed on the aircraft. <b>Note 1:</b> CPDLC message set differs for each	The DLR system must record the CPDLC messages for each data link type (i.e. Interop Designator) contained in AC 20-140C, <del>or later approved revision,</del> that is installed on the aircraft.	Disagree. Reference to current or later approved revision of AC 20-140 allows us to not have to revise AC 20-160A when the CPDLC message set defined in the Interop Standards

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			CPDLC system identified in AC 20-140C (or later).  We request that only the latest released version of AC 20-140 is referenced, since we wouldn't know the content of an as-yet unreleased AC revision.	<b>Note 1:</b> CPDLC message set differs for each CPDLC system identified in AC 20-140C <del>(or later)</del> .	of 20-140 changes. Recording of CPDLC messages is not relative to when a new or revised message set is defined.
4.	GE	Page 1 Section 1.1	Please define what it means to follow this AC in all “important respects”	Either provide a definition of “important respects” or, instead, call out the specific paragraphs that must be followed. Rationale: It is not clear what “important respects” means in this context.	Agree. Replaced “all important respects” with “its entirety”.
5.	GE	Page 1 Section 1.2	In the statement, “...physical locations within airborne avionic architectures deemed ideal for recording system data sources”, does this refer to those defined in ED-93?	If this is the case suggest add: “... as defined in Section 7.1 of this AC. Rational: to clarify the “ideal” locations for recording.	Agree. Incorporated suggested change.

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Attachment Referenced in Comment #2

**Table 2. Definition of Terms**

<b>Terminology</b>	<b>Meaning</b>	<b>Functional Impact</b>
Must	Indicates a mandatory requirement driven by regulation that is to be followed when using the guidance in this AC	Alternative means of compliance has to be accepted by the FAA
Should	Indicates a recommendation and not a requirement when using the guidance in this AC	Since this AC represents an accepted means of compliance, alternative methods to obtain a compliance finding will need to be discussed with the ACO in order to achieve a common performance level with the AC.